Memorandum

MIAMI-DADE COUNTY

Date: March 6, 2007

To: Honorable Chairman Bruno A. Barreiro and Members, Board of County Commissioners

From: George M. Burgess, County Manager

Subject: Miami-Dade County Membership in the Chicago Climate Exchange

Agenda Item No. 12(B)4

At their September 25, 2006 meeting, the Board adopted Resolution No. R-1204-06, sponsored by Commissioner Seijas, and directing the County Manager to prepare and submit a report and recommendation regarding the possibility of Miami-Dade County (County) joining the Chicago Climate Exchange (CCX). Since that time the Department of Environmental Resources Management (DERM) collected fuel and energy consumption data from several County departments for the CCX to calculate a baseline emissions total for the County. On January 5, 2007, the CCX provided DERM a detailed data analysis of the County's baseline emissions numbers and future year fuel and energy consumption data (Attachment 1). This report describes the goals and purpose of the CCX, the various membership options in the CCX, and my recommendation going forward as it relates to the County being a part of the CCX.

The CCX is a voluntary, self-regulating, multi-sector program that is designed to quantify, verify, register, reduce, and trade the emissions of various greenhouse gases. Although membership itself in the CCX is voluntary, members make a legally binding commitment, to reduce greenhouse gas emissions by a set percentage of their baseline emissions. The stated goals of the CCX are as follows:

- To facilitate the transaction of greenhouse gas emissions allowance trading price transparency, design excellence, and environmental integrity.
- To build the skills and institutions needed to cost-effectively manage greenhouse gas emissions.
- To facilitate capacity-building in both the public and private sectors to facilitate greenhouse gas mitigation.
- To strengthen the intellectual framework required for cost-effective and valid greenhouse gas reduction.
- To help inform the public debate on managing the risk of global climate change.

As mentioned above, submittal of fuel and energy consumption data and establishment of a baseline emissions number is required for membership. The CCX distinguishes fuel and energy consumption data into two categories: Direct Emissions and Indirect Emissions, respectively. To join the CCX, only Direct Emissions are required to be used in calculation of baseline emissions for membership purposes; use of Indirect Emissions is optional. This distinction will be discussed further below.

There are two (2) types of membership options: Phase I and Phase II. Phase I requires members to reduce their baseline emissions by 1% annually, or a total of 4%, by the end of calendar year 2006. Due to the timing of our proposed membership, the County cannot join as a Phase I member. Therefore, the County would be required to join as a Phase II member, meaning that we would be required to reduce our emissions by 1.5% annually, for a total of 6%, over the 4-year period of 2007 through 2010. Attachment 1, the January 5, 2007, CCX analysis, projects future emissions levels for both Direct and Indirect emissions using the data provided by the County for the years 2000-2006. Based on the growth of our fuel and energy consumption versus the reduction targets required by CCX, it is expected that the County would be a "buyer" of emission credits over the 4-year term of our membership. As mentioned in the January 16, 2007, CCX status report that was provided to the INLUC Committee (Attachment 2), the costs to the County as a "buyer" of emission credits for Direct Emissions could be approximately $280,000 over the 4-year period, and for Indirect emissions (optional), is approximately $1.4 million over that same period, not including estimated membership fees of $25,000 over that term.

The magnitude of measures the County would have to take in order to reduce the "buyer" costs for a Phase II membership are significant. For example, the County would have to reduce its current fuel usage by 40%, or roughly 12.4 million gallons of combined fuel usage, in 2007 alone. While implementing such an action over time to reduce our greenhouse gas emissions is certainly a goal of the County, it is clear that financial realities and feasibility of accomplishing such significant reductions in the near term is nearly impossible as we expand the use of our bus fleet and continue to grow in population. If we became members, it would be our goal to revise the bus fleet calculation so as to receive credit for expanding public transit.

Even with the financial risk, joining the CCX will provide many advantages and benefits for the County. This includes an increased awareness of the need to implement greenhouse gas initiatives by County departments, solidification of the County's reputation as a leader in greenhouse gas reduction, and access to state of the art emissions management tools. Further, having a seat at a national forum regarding climate change issues is important, as this topic has now moved to the national stage.

At this time, I am recommending that the County join the CCX as a Phase II member for Direct Emissions only. Joining for Direct Emissions only will allow the County to be a part of the CCX while limiting our financial exposure as we grow to better learn and understand their systems and policies and further reduce our greenhouse gas emissions. As part of this recommendation, it will also be necessary to obtain authorization from the Board to set aside first-year estimated funding of approximately $80,000, not including possible administrative costs and implementation of our membership. While a funding source has not yet been identified, I have directed the Office of Strategic Business Management (OSBM) to examine some possible options that could include a cost-share arrangement between County departments based on their ability to meet baseline target emissions, a surcharge on fuel purchases by County departments, or resources generated from the sale of recycled materials. Departments most likely to be affected by this are the Water and Sewer Department, Department of Solid Waste Management, Miami-Dade Transit, Miami-Dade Police Department, Public Works Department, the Parks and Recreation Department, and the General Services Administration.

Assistant County Manager

ATTACHMENT 1

CCX
Chicago Climate Exchange™

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January 5, 2007

Carlos Espinosa, PE
Director, Department of Environmental
Resources Management
Miami-Dade County
33 Southwest 2nd Avenue PH 2
Miami, FL 33130

Dear Mr. Espinosa,

Pursuant to inquires by your staff and conference call on 1/4/06, attached is the data analysis we are able to provide relative to CCX membership.

Apropos of several other points we discussed with Mr. Wong, Ms. Griner and Mr. Gandi:

<u>Buying allowances as a greenhouse gas reduction tool</u>
As we discussed, it appears as if Miami-Dade County would be a buyer in CCX and in this case Membership would thus involve an ongoing "cost" to the County. However as we discussed, a cap-and-trade system is designed to incentivize reductions from ALL sectors and emissions and to enable the most cost-effective cuts to be achieved as soon as possible. Thus it is possible that the dollars spent buying may represent the most cost effective reductions available to the County if it wishes to make a global contribution to climate change mitigation at this time.

We would suggest that the "cost" of CCX membership will be dwarfed by the developing value of membership terms of the County's ability to manage and track emissions and energy use, as well as manage, track, highlight and maximize energy efficiencies and reduce energy waste. As we've said, CCX is a "turn key" emissions management system and as such will deliver value and return to the County on an ongoing basis.

In short, the dollars spent buying allowances:

a) are contributing to bona fide ghg reductions under the CCX cap-and trade
b) can be viewed as an investment that will helping the County develop long-term energy and emissions management systems over time that will in turn deliver value and possible revenue to the public budget through minimization of waste
c) enable the County to highlight where best to spend "green" dollars so that these dollars are deployed where they will deliver the most actual green benefit especially in terms of greenhouse gas reductions
d) put the County at the forefront of practical and intellectual development of cap-and trade market architecture and innovation, including the development of new protocols of importance to public sector entities such as public transportation "credit" systems.

<u>Miami-Dade's Urban CO_2 Reduction Plan</u>
It would be helpful for us to know more about the reductions the County has achieved under this plan. As you know, CCX is a legally binding commitment and therefore the County commitment/membership would cover only those emissions for which the County is legally responsible, which is normally County-owned facilities.

If the County "owns" reductions through the CO_2 Reduction Plan, these may be included in the CCX membership structure.

Feel free to call with any questions.

Many thanks,
Paula DiPerna
Executive Vice President, Corporate Recruitment & Public Policy

Cc: Debbie Griner, Patrick Wong, Venu Gandi

Discussion Memorandum

CONFIDENTIAL – FOR INTERNAL USE

January 5, 2007

From: Paula DiPerna, Executive Vice President for Corporate Recruitment and Policy, Chicago Climate Exchange (CCX)

To: Carolos Espinosa, PE, Director of Environmental Resources Management
Debbie Griner, Project Supervisor
Patrick Wong, Chief, Air Quality Management Division
Venu Gandi, Engineer 2, Air Quality Management Division

Cc: Angela Leontis, CCX

Re: Miami-Dade County -- Summary of Baseline & Buyer Position, Membership in CCX, Phase II

This memo summarizes data and potential position of Miami-Dade County in the Chicago Climate Exchange for Phase II (2007-2010) and follows a teleconference with Debbie Griner, Ray Baker, Venu Gandi and Patrick Wong on January 4, 2007. On the call, the County's data and CCX membership were discussed. It was explained that, based on data provided by Miami-Dade County to CCX, CCX projects the County to be in a buyer position for Phase II. Miami-Dade staff requested a CCX analysis to provide a detailed explanation of this position. For the past several months, CCX has been in communication with the Miami-Dade staff as it has undergone the process of assembling its emissions inventory in preparation for its report reviewing CCX and evaluating the potential for Miami-Dade County's membership in the Exchange. The origin of CCX and Miami-Dade County's discussions was a National Association of Counties (NACo) briefing on CCX in Chicago in August 2006, where Miami-Dade County expressed interest in examining membership in CCX.

Summary

For Phase II, based on data provided by the County for baseline year 2000 and trends from 2003-2006, CCX has prepared an *estimate* analysis of Miami-Dade County's carbon dioxide (CO_2) emissions, the primary greenhouse gas (GHG) released by Miami-Dade County's operations. Based on this analysis of its emissions, CCX projects Miami-Dade County to be in a position to be a buyer of emission reduction allowances for CCX Phase II (years 2007-2010). Based on projections that Miami-Dade County's direct emissions would remain flat at 2006 levels, this would result in a *minimum*[1] buy position of 70,174 metric tons over years 2007-2010. At January 4, 2007 CCX closing prices of $4.00 per metric ton CO_{2e}, the cost of these allowances would be valued at $280,696. (See Table 1; also see www.chicagoclimateexchange.com for daily prices.)

The optional inclusion of indirect emissions in Miami-Dade County's CCX reduction commitment would result in an additional buy position of a minimum of 343,569 metric tons (see table 2). This also assumes that indirect emissions would remain flat at 2006 levels. The comprehensive buy position of both direct and indirect emissions, assuming emissions remain flat at 2006 levels, would be 413,743 metric tons during Phase II.

[1] Includes direct emissions only.

Note on Data Assumptions and Calculations

For the purpose of this analysis, projections assume emissions remain flat at 2006 levels during Phase II years (2007-2010). Should emissions decrease below 2006 levels over the course of Phase II years, Miami-Dade County's emissions position could change.

Miami-Dade County has warranted to CCX that data provided includes natural gas, propane, jet fuel, LPG, unleaded gasoline, diesel and electricity purchases for years 2000 and 2003-2006.
Missing data in Baseline (2000) year includes:

- Miami-Dade Police Department generator LPG and diesel data
- Propane consumption

For purposes of calculating the Baseline, a 1% per year emissions growth rate protocol was applied to data provided by the County for later years, as defined by CCX Rules. (LPG and diesel data was extrapolated from data provided for 2004; propane data was extrapolated from data provided for 2001).

Note: Some incomplete police CNG and Public Works equipment data was omitted and considered de minimis by CCX staff (less than 5% of Baseline).

Miami-Dade County, Phase II (2007-2010) Data Analysis

The tables on the next pages present Miami-Dade County's Baseline and 2003-2006 emissions along with its annual reduction targets and projected emissions position for Phase II (2007-2010). CCX distinguishes between a Member's Direct and Indirect Emissions. Direct Emissions or Owned Emissions[2] result from the Member's on-site combustion of fossil fuels such as natural gas and coal and are presented in Table 1. Indirect Emissions result from the Member's purchase of electricity and its corresponding emissions are presented in Table 2. Inclusion of a Member's Indirect Emissions into the CCX program is optional, but encouraged. Earned "surplus" allowances from Indirect Emissions can be used to offset an increase in Direct Emissions and vice versa. Emission reductions associated with electricity purchases are subject to the same limits on sales and liability that are applied to direct emissions.

Table 1: Direct Emissions Position Phase II (year 2000 Baseline)

(all figures in metric tons CO2)	**2000 Baseline**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**
1. CCX Reduction Target	% Below Baseline					1.50%	3.00%	4.50%	6.00%
	Metric Tons					256,005	252,107	248,208	244,310
2. Owned Emissions	259,904	275,153	277,073	301,082	279,753	279,753	279,753	279,753	279,753
3. Gross Amount						-23,748	-27,646	-31,545	-35,443
4. Net Position						BUY	BUY	BUY	BUY
5. Maximum Recognized Reductions/Max Recognized Increases (EGP)	% of Baseline					4.5%	6%	7.5%	9%
	Metric Tons					11,696	15,594	19,493	23,391
6. Required Purchase						11,696	15,594	19,493	23,391
7. Allowed Sales/Banking						n/a	n/a	n/a	n/a

[2] **Owned Emissions** are the direct greenhouse gas emissions, expressed in metric tons carbon dioxide (CO_2) equivalent, associated with the activities undertaken at facilities the CCX Member owns and are defined on the basis of the Member's equity ownership percentage of a jointly owned facility that releases GHGs.

Table 1 shows Miami-Dade County's Direct Emissions Baseline to be approximately 259,904 metric tons CO_2. This figure is calculated using the County's owned emissions from the year 2000[3]. Reported emissions in 2003-2006 are 275,153 metric tons, 277,073 metric tons, 301,082 metric tons and 279,753 metric tons CO_2 respectively. Over the 2003-2006 time period, Miami-Dade County's emissions grew, on average, about 9% above the Baseline level. Should this trend continue in the future, it can be expected that Miami-Dade County will be in a buy position during all Phase II years.

Miami-Dade County emission reduction targets for Phase II would be 1.5% per year below Baseline, as outlined in row 1. If emissions stayed relatively flat at 2006 levels, Miami-Dade County would fall short of its annual CCX reduction commitments. The gross amount of shortages is presented in row 3. Row 5 shows the maximum recognized reductions as dictated by the Economic Growth Provision (EGP). The EGP limits the maximum increase in emissions for the purpose of True-up at 3% above baseline for years 2007 through 2010. (This provision is applied symmetrically around reduction targets, thereby providing a limit on both required purchases and allowed sales). When combined with the CCX annual reduction targets, these limits result in a maximum required purchase level that is 4.5% of baseline in 2007, 6% of baseline in 2008, 7.5% of baseline in 2009 and 9.0% of baseline in 2010. The corresponding metric ton amounts are presented in rows 5 and 6 of the table above.

Table 2: Indirect Emissions Position Phase II (year 2000 Baseline)

(all figures in metric tons CO2)	2000 Baseline	2003	2004	2005	2006	2007	2008	2009	2010
1. CCX Reduction Target	% Below Baseline					1.50%	3.00%	4.50%	6.00%
	Metric Tons					1,253,388	1,234,301	1,215,214	1,196,127
2. Owned Emissions	1,272,476	1,362,930	1,264,720	1,392,079	1,492,795	1,492,795	1,492,795	1,492,795	1,492,795
3. Gross Amount						-239,407	-258,494	-277,581	-296,668
4. Net Position						**BUY**	**BUY**	**BUY**	**BUY**
5. Maximum Recognized Reductions/Max Recognized Increases (EGP)	% of Baseline					4.5%	6%	7.5%	9%
	Metric Tons					57,261	76,349	95,436	114,523
6. Required Purchase						57,261	76,349	95,436	114,523
7. Allowed Sales/Banking						n/a	n/a	n/a	n/a

Table 2 outlines Miami-Dade County's Indirect Emissions from electricity purchases. The CCX Indirect Emissions Baseline is calculated as the average megawatt hours purchased during the baseline period (the year 2000) and converted to metric tons CO_2. CCX uses a conversion rate of 0.61 metric tons CO_2 per purchased MW hour. This rate reflects the U.S. average emissions rate for electricity production during the CCX Baseline period.

Miami-Dade County's Indirect Emissions Baseline totals 1,272,476 metric tons. From this Baseline, CCX Phase II Members make a legally binding commitment to a 1.5% reduction each year. This reduction target is compared against the company's Indirect Emissions during each of the program years. Miami-Dade County's 2003, 2004, 2005 and 2006 emissions are outlined in row 2 above. Over the 2003-2006 time period, Miami-Dade County's emissions grew, on average, about 4.3% above the Baseline level.

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[3] All calculations used for this document were prepared using data provided by Miami-Dade County. Miami-Dade County's LPG, propane and some gasoline and diesel data were missing for the year 2000. To accommodate for these gaps, a 1% per year emissions growth rate protocol was used, as defined by CCX Rules.

Should this growth trend continue, Miami-Dade County would be in a buy position for all Phase II program years.

Miami-Dade County emission reduction targets for Phase II would be 1.5% per year below Baseline, as outlined in row 1. Assuming emissions stay relatively flat at 2006 levels, Miami-Dade County would fall short of its annual CCX reduction commitments. The gross amount of shortages is presented in row 3. Row 5 shows the maximum recognized reductions as dictated by the Economic Growth Provision (EGP). The EGP limits the maximum increase in emissions for the purpose of True-up at 3% above baseline for years 2007 through 2010. Row 5 captures the "maximum buy" scenario. Should emissions continue to follow recent trends, they will increase over time and the County will need to purchase Carbon Financial Instrument™ (CFI™) contracts for annual compliance True-up in a quantity dictated by the Economic Growth Provision (see row six).

Neither CCX nor any of its respective officers and employees make any express or implied representation, warranty or undertaking with respect to the calculations contained herein, and none of them accept any responsibility or liability as to their accuracy or completeness. The information contained in this document should not be considered as a recommendation by CCX in relation to any decision by Miami-Dade County. This information has not been reviewed by the NASD or independently verified.

– Appendices –

Appendix 1 – Methodology
Appendix 2 – Terms Defined

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Appendix 1
– Methodology –

Introduction

For those facilities and/or activities that are included in the CCX Emission Reduction Schedule, the entity will determine a Baseline average level of emissions (the average of emissions for the years 1998-2001) and includes those emission sources to the CCX Emission Reduction Schedule for the duration of the pilot market time period (2003-2006). The Emission Reduction Schedule is 1% below-Baseline in 2003, 2% below-Baseline in 2004, 3% in 2005 and 4% in 2006. Those that cut further can sell surplus emission allowances. Those that cannot make sufficient cuts internally must achieve annual compliance through purchase of emission allowances from those making extra cuts. Each Member's Baseline is adjusted to reflect facility acquisitions and sales. Emissions from combustion of renewable fuels are excluded. Entities that own eligible project-based Offsets can sell those or use them as a "credit" against emissions.

Emissions to be Included

Each CCX Member includes in its Emission Baseline and Periodic Emission Reports its Owned Emissions from all Large Emission Sources, as defined in the CCX Rulebook (see below). "Owned Emissions" are defined on the basis of a Member's Equity Ownership Percentage in an emission source. For example, if an entity has a 20% or higher ownership share in an emitting facility, that percentage of the co-owned plant's emissions would be included in that entity's baseline and subsequent periodic emission reports. "Large Emission Sources" as follows:

1. for CCX Members with entity-wide Owned Direct Emissions less than 200,000 metric tons of CO_2 equivalent per year, Large Emissions Sources are those facilities or activities with Owned emissions of 10,000 metric tons of CO_2 equivalent per year or more;
2. for CCX Members not primarily engaged in electricity production and having entity-wide Owned Direct Emissions of 200,000 metric tons CO_2 equivalent per year or more, those facilities and activities that release emissions owned by the Member that are estimated to be 5% or more of the Member's total owned emissions; and,
3. for CCX Members primarily engaged in electricity production, Large Emissions Sources are defined as electric power generation facilities having a rated capacity of 25 megawatts or larger.

Each CCX Member may elect to "Opt-in" the following emission sources, which would then be included in the Member's Emission Baseline, Emissions Reduction Schedule and Periodic Emission Reports:

1. electricity purchases, which are converted to CO_2 emissions using national average emission rates
2. emissions from Small Emission Sources and emissions sources in which the CCX Member holds a minor ownership percentage;
3. emissions associated with activities in Canada and Mexico; and,
4. non-CO_2 emissions associated with fossil fuel combustion (N_2O and CH_4).

Appendix 2

– Terms Defined –

Attachment 3 defines the terms unique to the CCX emission reduction and trading program that are used in this Memo. Terms are listed in the order in which they appear in the Memo.

Owned Emissions are the direct greenhouse gas emissions, expressed in metric tons carbon dioxide (CO_2) equivalent, associated with the activities undertaken at facilities the CCX Member or Associate Member owns and are defined on the basis of the Member's or Associate Member's Equity Ownership Percentage of a Jointly Owned facility that releases GHGs.

> <u>Relevant section(s) of CCX Rulebook Section 4.11.2:</u>
>
> *Each CCX Member and Associate Member is to include in its Emission Baseline and Periodic Emission Reports its Owned Emissions from all Large Emission Sources in which the CCX Member's or Associate Member's Equity Ownership Percentage is greater than or equal to 20%, subject to provisions contained in this Chapter. Exceptions to this provision may be recommended, on a case-by-case basis, by the CCX Committee on Environmental Compliance if a CCX Member's Equity Ownership Percentage of a Large Emission Source or Large Electricity Purchase Activities is less than or equal to 50% and data on emissions or electricity purchases from the jointly owned facility are not accessible to the CCX Member.*

Large Emission Sources are:

1. for CCX Members not primarily engaged in electricity production and having entity-wide Owned Direct Emissions of 200,000 tons CO_2 equivalent per year or more, those facilities and activities that release emissions owned by the Member that are estimated to be 5% or more of the Member's total owned emissions;
2. for CCX Members having estimated entity-wide Owned Direct Emissions totaling less than 200,000 metric tons of CO_2 equivalent per year, Large Emission Sources are those facilities or activities that have Owned emissions of 10,000 metric tons of CO_2 equivalent per year or more; and,
3. for CCX Members primarily engaged in electricity production, Large Emission Sources are defined as electric power generation facilities having a rated capacity of 25 megawatts or larger.

Small Emission Sources are:

1. for CCX Members having entity-wide Owned Direct Emissions of 200,000 tons CO_2 equivalent per year or more, those facilities or activities that release emissions owned by the Member that are estimated to be less than 5% of the Member's total Owned Direct Emissions;
2. for CCX Members having estimated entity-wide Owned Direct Emissions totaling less than 200,000 metric tons of CO_2 equivalent per year, those facilities or activities that have Owned emissions of 10,000 metric tons of CO_2 equivalent per year; and,
3. for CCX Members primarily engaged in electricity production, electric power generation facilities having a rated capacity of less than 25 megawatts.

Opt-in is the election by a CCX Member or Associate Member to include in its Emissions Baseline and Emission Inventory emissions from sources whose inclusion is not mandated as a condition of CCX membership.

> <u>Relevant section(s) of CCX Rulebook Section 4.11.2:</u>

Each CCX Member and Associate Member may elect to include as a Supplemental Reduction Objective additional activities through the following Opt-in programs:

1. *Small Emission Source Opt-in (Direct Emissions*
2. *Minor Ownership Opt-in*
3. *Electricity Purchase Opt-in (for CCX Members not primarily engaged in electricity production)*
4. *Geographic Opt0in (direct emissions and electricity purchases in NAFTA countries)*
5. *Non- CO_2 emissions Opt-in.*

The **Economic Growth Provision** is a provision that limits the maximum increase in emissions above a Member's Emission Baseline that will be recognized in determining the annual True-up for each CCX Member. This Provision also applies to changes in Carbon Stocks on lands of CCX Members that are forest product companies. (Sections 4.8, 8.14)

The **Maximum Recognized Emission Reduction** is a limitation on the maximum reductions in CO_2 equivalent emissions that will be recognized in determining the quantity of surplus Exchange Allowances a CCX Member may sell or bank, as a result of the symmetric application of the Economic Growth Provision. (Section 4.11.2)

ATTACHMENT 2

Memorandum

MIAMI-DADE COUNTY

INLUC
Agenda Item No. 7(F)

Date: January 16, 2007

To: Honorable Chairman Bruno A. Barreiro
and Members, Board of County Commissioners

From: George M. Burgess
County Manager

Subject: Chicago Climate Exchange Status Report

At the December meeting of the Infrastructure and Land Use Committee (INLUC), it was reported that staff was gathering the data necessary to provide to the Chicago Climate Exchange (CCX) so that a greenhouse gas emissions baseline could be established for Miami-Dade County. That process has been completed and the CCX just recently provided an analysis to the County on January 5, 2007 (see attached letter). Staff is evaluating this analysis to determine if joining the CCX is a viable option for the County. However, early indications are that the County would have to join the CCX as a "buyer" of emissions credits. The cost to the County as a "buyer" of emissions credits from 2007-2010 for shortfalls in the reduction of direct emissions (fuels) is estimated at approximately $280,000. For indirect emissions (electricity consumption), which is optional for membership, the estimated cost to the County due to projected shortfalls between 2007-2010 would be approximately $1.4 million. This would be a significant financial investment. Nonetheless, DERM is completing their evaluation of the CCX analysis and should have a full recommendation, as well as any other possible alternatives, for the February INLUC meeting.

Assistant County Manager